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7 Attorney for Joshua Cola

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 JOSHUA COLA ET AL,  
15 Defendant.  
16

Case No. 2:20-cr-00295-JCM-EJY

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Melanee Smith, Assistant United States Attorney,  
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
20 and Robert O'Brien, Assistant Federal Public Defender, counsel for Joshua Cola, and James A.  
21 Oronoz, counsel for Jamar Richardson, that the previously ordered deadline for filing of pretrial  
22 motions be vacated and that the parties herein shall have to and including March 5, 2021, within  
23 which to file the Defendant's pretrial motions.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including March 19, 2021, to file any and all responsive pleadings.  
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including March 26, 2021, to file any and all replies to dispositive motions.

3 The Stipulation is entered into for the following reasons:

4 1. Counsel for the defendant needs additional time to discuss the case with the  
5 defendant before the filing of pretrial motions.

6 2. The defendant is incarcerated and does not object to the continuance.

7 3. The parties agree to the continuance.

8 4. The additional time requested herein is not sought for purposes of delay, but  
9 merely to allow counsel for defendant sufficient time within which to discuss the case with his  
10 client and prepare appropriate motions.

11 5. Additionally, denial of this request for continuance could result in a miscarriage  
12 of justice.

13 This is the second stipulation to continue filed herein.

14 DATED this 3<sup>rd</sup> day of February, 2021.

15 RENE L. VALLADARES  
16 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

17 */s/ Robert O'Brien*  
18 By \_\_\_\_\_  
19 ROBERT O'BRIEN  
Assistant Federal Public Defender

*/s/ Melanee Smith*  
By \_\_\_\_\_  
MELANEE SMITH  
Assistant United States Attorney

20  
21 By */s/ James A. Oronoz*  
22 JAMES A. ORONoz  
Counsel for Jamar Richardson  
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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,  
6 v.  
7 JOSHUA COLA,  
8 Defendant.

Case No. 2:20-cr-00295-JCM-EJY

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. Counsel for the defendant needs additional time to discuss the case with his  
14 client before the filing of pretrial motions.

15 2. The defendant is incarcerated and does not object to the continuance.

16 3. The parties agree to the continuance.

17 4. The additional time requested herein is not sought for purposes of delay, but  
18 merely to allow counsel for defendant sufficient time within which to discuss the case with his  
19 client and prepare appropriate motions.

20 5. Additionally, denial of this request for continuance could result in a miscarriage  
21 of justice.

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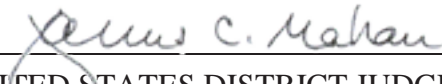
**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including March 5, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including March 19, 2021 to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including March 26, 2021 to file any and all replies to dispositive motions.

DATED February 5, 2021.

  
UNITED STATES DISTRICT JUDGE